

EXHIBIT 7

HIGHLY CONFIDENTIAL - Laura Slone

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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)
IN RE: NATIONAL PRESCRIPTION) MDL No. 2804
OPIATE LITIGATION)
)
-----) Case No. 1:17-MD-2804
)
THIS DOCUMENT RELATES TO:)
)
Case Track 8) Hon Dan A. Polster
)
-----)

VIDEOTAPED DEPOSITION OF LAURA SLONE
FRIDAY, OCTOBER 28, 2022

- - -

HIGHLY CONFIDENTIAL - SUBJECTIVE TO FURTHER
CONFIDENTIALITY REVIEW

- - -

Remote videotaped deposition of LAURA
SLONE, commencing at 10:05 a.m., on the above date,
before Juliana F. Zajicek, Registered Professional
Reporter, Certified Shorthand Reporter and Certified
Realtime Reporter.

- - -

GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
Deps@golkow.com

1 A P P E A R A N C E S :
2 (All Parties Appeared Remotely)

3 ON BEHALF OF THE PLAINTIFF:

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35 rmoore@bowlesrice.com

1 A P P E A R A N C E S :
2
3 (All Parties Appeared Remotely)

4 ON BEHALF OF PUBLIX SUPER MARKETS, INC.:

5 BARNES & THORNBURG LLP
6 11 South Meridian Street
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8 317-231-7501

9 BY: MONICA R. BROWNEWELL SMITH, ESQ.
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13 KARA KAPKE, ESQ.
14 kara.kapke@btlaw.com

15 ALSO PRESENT:

16 BILL HAMMOND, Senior Director,
17 Regulatory Legal and Litigation at
18 Publix Super Markets
19 JONATHAN JAFFE, Consultant;
20 DIANNE INT-HOUT, Trial/Exhibit Technician

21 THE VIDEOGRAPHER:

22 JUDY DIAZ
23 Golkow Litigation Services
24

HIGHLY CONFIDENTIAL Laura Slone

1 I N D E X

2

3 WITNESS:

PAGE:

4 LAURA SLONE

5 EXAM BY MS. BURNS..... 7

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9 E X H I B I T S

10 LAURA SLONE EXHIBIT MARKED FOR ID

11 No. 1 Notice of Remote Deposition of 23
Laura Slone

12

13 No. 2 Publix Super Markets, Inc. 26
Supplemental Objections and
14 Responses to Plaintiff's
Interrogatories to Chain Pharmacy
Defendants

15

16 No. 3 Personnel file; 111
PUBLIX-MDLT8-00146084 - 71017 No. 4 Document titled "receiving 120
Acceptable Product";

18 PUBLIX-MDLT8-00147027 - 102

19 No. 5 US DOJ, DEA December 27, 2007 120
letter to Dear Registrant;

20 PUBLIX-MDLT8-00147285 - 289

21 No. 6 US DOJ, DEA March 2, 2015 letter 120
to Publix Super Markets, Inc.;

22 PUBLIX-MDLT8-00066950

23 No. 7 E-mail chain dated 9/23/2015, 138
Subject: FW: Pharmacy Budget -

24 SOM, w/attachment;

~~HIGHLY CONFIDENTIAL~~ Laura Slone1
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E X H I B I T S

LAURA SLONE EXHIBIT

MARKED FOR ID

No. 8	E-mail dated 9/19/2012, Subject: Routine Compliance Inspection Permit 221471 Publix 9-19-2012, w/attachment; PUBLIXX-MDLT8-00065917 - 944	152
No. 9	E-mail dated 5/14/2015, Subject: Inspection 2, w/attachment; PUBLIX-MDLT8-00117886 - 898	169
No. 10	US DOJ DEA Report Of Investigation, Date Prepared 07-21-2015; DEA-T711CC-00010761 - 775	171
No. 11	E-mail chain dated 9/13/2016, Subject: Re: Publix Super Markets, Inc.; PUBLIX-MDLT8-00057007	190
No. 12	Pharmacy Procurement Update September 2014; PUBLIX-MDLT8-00118726 - 727	197
No. 13	E-mail dated 1/22/2014, Subject: 1/21 Returnables Discussion Minutes; PUBLIX-MDLT8-00118022	201
No. 14	E-mail chain dated 10/18/2013, Subject: RE: Controlled substance reporting 10-18-13; PUBLIX-MDLT8-0116904 - 907	205
No. 15	Orlando Pharmacy Warehouse Standard Operating Procedures; PUBLIX-MDLT8-00057706 - 743	216
No. 16	Pharmacy Warehouse Standard Operating Procedures; PUBLIX-MDLT8-00057749 - 8058	219

1		E X H I B I T S	
2	LAURA SLONE EXHIBIT		MARKED FOR ID
3	No. 17	E-mail chain dated 7/26/2018, Subject: FW: Pharmacy Warehouse SOP, w/attachment; PUBLIX-MDLT8-00088237 - 570	228
4			
5	No. 18	E-mail chain dated 11/14/2016, Subject: RE: Im20930419-Incorrect item received from warehouse; PUBLIX-MDLT8-00069351 - 359	236
6			
7	No. 19	E-mail chain dated 1/7/2018, Subject: RECCL: C2 Shortage PO # 138753-01-CCL Attached; PUBLIX-MDLT8-00070471 - 474	242
8			
9	No. 20	E-mail chain dated 6/15/20, Subject: Signatures needed - CSRA 590D & Distributor Agreement Publix Warehouse (RP0500391); ABDCMDL10851380 - 392	253
10			
11	No. 21	E-mail chain dated 5/22/2018, Subject: RE: 4-12-18 Theft w/attachment; ABDCMDL07395452 - 461	260
12			
13	No. 22	E-mail chain dated 3/19/2019, Subject: FW: Theft and losses; PUBLIX-MDLTI-00132595	266
14			
15	No. 23	E-mail chain dated 3/27/2019, Subject: RE: Store list for Morphine; PUBLIX-MDLT8-00098055 - 056	271
16			
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1 THE VIDEOGRAPHER: We are now on the record. My
2 name is Judy Diaz. I'm a legal videographer for
3 Golkow Litigation Services.

4 Today's date is October 28th, 2022, and
5 the time is 10:05 a.m.

6 This remote video deposition is being held
7 In the Matter of Opioid Litigation, Track 8.

8 The deponent is Laura Slone.

9 All parties to this deposition are
10 appearing remotely and have agreed to the witness
11 being sworn in remotely.

12 All counsel will be noted on the
13 stenographic record.

14 The court reporter is Juliana Zajicek, and
15 will now swear in the witness.

16 (WHEREUPON, the witness was duly
17 sworn.)

18 LAURA SLONE,
19 called as a witness herein, having been first duly
20 sworn, was examined and testified as follows:

21 EXAMINATION

22 BY MS. BURNS:

23 Q. Good morning, Ms. Slone. We met briefly
24 off the record. My name is Sarah Burns. I am counsel

1 A. Can you repeat the question?

2 BY MS. BURNS:

3 Q. Do you have any understanding as the
4 assistant manager of the pharmacy warehouse as to why
5 Publix transitioned to the Rocket Court warehouse?

6 MS. SMITH: Object to form, asked and answered.

7 BY THE WITNESS:

8 A. I know our capacity at the Sand Lake
9 facility was overgrowing in our legend drug area. As
10 we continued to add more stores, we had to have more
11 inventory and our capacity was becoming an issue.

12 BY MS. BURNS:

13 Q. Let's talk about Publix's stores.

14 How many Publix stores are there
15 nationwide?

16 A. We are somewhere around 1200, 1250 maybe.

17 MS. SMITH: Can I clarify, Sarah, are you asking
18 about pharmacies or grocery stores?

19 MS. BURNS: First let's start with stores.

20 BY THE WITNESS:

21 A. I think it's 1250, 1260.

22 BY MS. BURNS:

23 Q. Okay. And how many of those stores about,
24 approximately, include a pharmacy?

1 A. I think we are at about, approximately,
2 1202.

3 Q. Does Publix operate any standalone
4 pharmacies?

5 A. Yes.

6 MS. SMITH: Object to form.

7 BY MS. BURNS:

8 Q. Pardon. I didn't hear the answer.

9 A. Yes.

10 Q. Where are those standalone pharmacies?

11 A. I think we have them in the hospitals.

12 Q. How many of -- how many standalone
13 hospital pharmacies does Publix operate?

14 A. I don't know exactly. Maybe 10 or 11.

15 Q. Does Publix operate any pharmacies besides
16 store pharmacies, hospital pharmacies, any other
17 pharmacies besides those?

18 A. One more time, please.

19 Q. Does Publix operate any other pharmacies
20 besides the store pharmacies and the hospital
21 pharmacies?

22 A. I'm not sure I understand.

23 Q. Does Publix have a central fill pharmacy?

24 A. Yes.

1 substances?

2 MS. SMITH: Objection to form.

3 BY MS. BURNS:

4 Q. Let me rephrase that.

5 Are you aware if it was a consideration in
6 moving to a larger pharmacy facility that Publix
7 needed more space to store controlled substances?

8 MS. SMITH: Object to form.

9 BY THE WITNESS:

10 A. I know that our control cage at Sand Lake,
11 if we were going to carry any other NDCs or more NDCs,
12 that we wouldn't have space for that.

13 BY MS. BURNS:

14 Q. The cage, the controlled cage at Sand Lake
15 was too small to accommodate the number of controlleds
16 that Publix was carrying?

17 MS. SMITH: Object to form.

18 BY THE WITNESS:

19 A. No, no.

20 BY MS. BURNS:

21 Q. Did Publix have plans to carry more NDCs
22 for controlled substances in 2015?

23 MS. SMITH: Object to form.

24 BY THE WITNESS: